

ORIGINAL

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

OCT 02 2007

at 1 o'clock and 00 min PM  
SUE BEITIA, CLERK

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII**

IN RE:

ESTATE OF FERDINAND MARCOS  
HUMAN RIGHTS LITIGATION

THIS DOCUMENT RELATES TO:

Sison v. Marcos;  
Piopongco v. Marcos.

**MOTION FOR SUBSTITUTION  
OF PLAINTIFF**

MDL NO. 840

Cv. No. 86-225

Cv. No. 87-138

**[Filed concurrently with  
Memorandum of Points and  
Authorities; Declaration of  
Elizabeth Piopongco; Declaration of  
Paul Hoffman; [Proposed] Order]**

Date: To be Set  
Time: To be Set  
Courtroom: To be Set  
Judge: Manuel L. Real

TO THE COURT AND ALL INTERESTED PARTIES AND THEIR  
ATTORNEYS OF RECORD:

Elizabeth Piopongco hereby moves, by and through counsel, pursuant to  
Fed. Rule of Civil Procedure 25, for a substitution of parties based on the  
following:

1. On or about November 26, 2006, Plaintiff, Jaime Piopongco, died. A  
true and correct copy of the Certificate of Death is attached as Exhibit A to the  
Declaration of Elizabeth Piopongco filed concurrently herewith.


2. Elizabeth Piopongco is Plaintiff's wife, heir, successor and a distributee  
of Plaintiff's estate.

1           3. The final judgment rendered in Plaintiff's favor was not extinguished by  
2 his death.

3           4. Elizabeth Piopongco therefore moves this Honorable Court to substitute  
4 her as successor of Plaintiff Jaime Piopongco for all purposes concerning the  
5 collection and satisfaction of the judgment entered in Jaime Piopongco's favor and  
6 for such other relief as this Court may deem as just and proper under the premises.

7  
8 Respectfully submitted,

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11  
12 Dated: October 1, 2007

  
\_\_\_\_\_  
Paul L. Hoffman  
Attorneys for Plaintiffs  
Jose Maria Sison  
Jaime Piopongco  
Estate of Francisco Sison

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 723 Ocean Front Walk, Venice, California 90291.

On October 1, 2007, I served the foregoing documents described as:

*Motion for Substitution of Plaintiff*

on all interested parties in this action. By placing the X original or a \_\_\_\_ true copy thereof enclosed in sealed envelope addressed as follows:

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11 X

[BY MAIL] I caused such envelope to be deposited in the mail at Venice, California. The envelope was mailed with postage thereof fully prepaid.

12 [BY PERSONAL SERVICE] I caused such envelope to be delivered by hand to the offices of the addressee(s).


13 [FEDERAL EXPRESS] I caused such envelope to be delivered via federal express at Venice, California.

14 [BY FAX] I transmitted the above document to the above facsimile.

15 [STATE] I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

16 X

[FEDERAL] I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

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20 Melanie T. Partaw  
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